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Attorneys for Eyre Plaintiffs

### IN THE UNITED STATES DISTRICT COURT

#### FOR THE DISTRICT OF OREGON

#### PENDLETON DIVISION

OREGON FIREARMS FEDERATION, INC., et al..

Plaintiffs,

v.

TINA KOTEK, et al.,

Defendants.

MARK FITZ, et al.,

Plaintiffs,

v.

ELLEN F. ROSENBLUM, et al.,

Defendants.

KATERINA B. EYRE, et al.,

Plaintiffs,

v.

ELLEN F. ROSENBLUM, et al.,

Defendants.

DANIEL AZZOPARDI, et al.,

Plaintiffs,

v.

ELLEN F. ROSENBLUM, et al.,

Defendants.

Case No. 2:22-cv-01815-IM (*Lead Case*)

Case No. 3:22-cv-01859-IM (Trailing Case)

Case No. 3:22-cv-01862-IM (Trailing Case)

Case No. 3:22-cv-01869-IM (Trailing Case)

## **CONSOLIDATED CASES**

DECLARATION OF SHAWN M. LINDSAY IN SUPPORT OF PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT OR, IN THE ALTERNATIVE, TRIAL BRIEF

- I, Shawn M. Lindsay, declare as follows:
- 1. I am a partner at JurisLaw LLP in the above-captioned matter and am one of the attorneys for the *Eyre Plaintiffs*. The following statements are true and correct and, if called upon, I could competently testify to the facts averred herein.
- 2. Attached as **Exhibit A** is a true and accurate excerpt of the transcript of the Rule 30(b)(6) deposition of Wendy Landers, of the Oregon State Police, taken on May 5, 2023.
- 3. Attached as **Exhibit B** is a true and accurate excerpt of the CLEAN transcript of the Rule 30(b)(6) deposition of Karen LeJeune, of the Oregon State Police, taken on May 5, 2023.
- 4. Attached as **Exhibit** C is a true and accurate excerpt of the transcript of the deposition of Dennis E. Baron taken on March 30, 2023.
- 5. Attached as **Exhibit D** is a true and accurate excerpt of the ROUGH transcript of the Rule 30(b)(6) deposition of Karen LeJeune, of the Oregon State Police, taken on May 5, 2023.
- 6. Attached as **Exhibit E** is a true and accurate excerpt of the transcript of the deposition of Brian DeLay taken on March 14, 2023.
- 7. Attached as **Exhibit F** is a true and accurate excerpt of the transcript of the deposition of Brennan N. Rivas taken on March 21, 2023.
- 8. Attached as **Exhibit G** is a true and accurate excerpt of the transcript of the deposition of Robert J. Spitzer taken on April 5, 2023.
- 9. Attached as **Exhibit H** is a true and accurate excerpt of the Defendants' Response to Plaintiffs' First Set of Requests for Admission dated April 14, 2023.
- 10. Attached as **Exhibit I** is a true and accurate excerpt of the Defendants' Response to Plaintiffs' First Set of Interrogatories dated April 14, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: May 12, 2023

# JURISLAW LLP

s/Shawn M. Lindsay

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Counsel for Eyre Plaintiffs